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8 IN THE UNITED STATES DISTRICT COURT

9 EASTERN DISTRICT OF CALIFORNIA

10

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 APPROXIMATELY \$19,100.00 IN  
U.S. CURRENCY,

15 Defendant.

2:24-MC-00169-DJC-SCR

16

17 STIPULATION AND ORDER EXTENDING TIME  
FOR FILING A COMPLAINT FOR FORFEITURE  
AND/OR TO OBTAIN AN INDICTMENT  
ALLEGING FORFEITURE

18 It is hereby stipulated by and between the United States of America and potential claimant Steven  
19 Zangrilli (“claimant”), appearing *in propria persona*, as follows:

20 1. On or about January 25, 2024, claimant filed a claim in the administrative forfeiture  
21 proceeding with the U.S. Postal Inspection Service with respect to the Approximately \$19,100.00 in U.S.  
22 Currency (hereafter “defendant currency”), which was seized on November 2, 2023.

23 2. The U.S. Postal Inspection Service has sent the written notice of intent to forfeit required  
24 by 18 U.S.C. § 983(a)(1)(A) to all known interested parties. The time has expired for any person to file a  
25 claim to the defendant currency under 18 U.S.C. § 983(a)(2)(A)-(E), and no person other than claimant  
26 has filed a claim to the defendant currency as required by law in the administrative forfeiture proceeding.

27 3. Under 18 U.S.C. § 983(a)(3)(A), the United States is required to file a complaint for  
28 forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant

1 currency is subject to forfeiture within ninety days after a claim has been filed in the administrative  
2 forfeiture proceeding, unless the court extends the deadline for good cause shown or by agreement of the  
3 parties. That deadline was April 24, 2024.

4       4. By Stipulation and Order filed April 24, 2024, the parties stipulated to extend to June 24,  
5 2024, the time in which the United States is required to file a civil complaint for forfeiture against the  
6 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to  
7 forfeiture.

8       5. By Stipulation and Order filed June 25, 2024, the parties stipulated to extend to July 24,  
9 2024, the time in which the United States is required to file a civil complaint for forfeiture against the  
10 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to  
11 forfeiture.

12       6. By Stipulation and Order filed July 24, 2024, the parties stipulated to extend to August 23,  
13 2024, the time in which the United States is required to file a civil complaint for forfeiture against the  
14 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to  
15 forfeiture.

16       7. By Stipulation and Order filed August 23, 2024, the parties stipulated to extend to October  
17 22, 2024, the time in which the United States is required to file a civil complaint for forfeiture against the  
18 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to  
19 forfeiture.

20       8. By Stipulation and Order filed October 22, 2024, the parties stipulated to extend to  
21 December 20, 2024, the time in which the United States is required to file a civil complaint for forfeiture  
22 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is  
23 subject to forfeiture.

24       9. By Stipulation and Order filed December 20, 2024, the parties stipulated to extend to  
25 January 17, 2025, the time in which the United States is required to file a civil complaint for forfeiture  
26 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is  
27 subject to forfeiture.

28       10. By Stipulation and Order filed January 21, 2025, the parties stipulated to extend to

1 February 18, 2025, the time in which the United States is required to file a civil complaint for forfeiture  
2 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is  
3 subject to forfeiture.

4 11. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to further extend  
5 to March 20, 2025, the time in which the United States is required to file a civil complaint for forfeiture  
6 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is  
7 subject to forfeiture.

8 12. Accordingly, the parties agree that the deadline by which the United States shall be  
9 required to file a complaint for forfeiture against the defendant currency and/or to obtain an indictment  
10 alleging that the defendant currency is subject to forfeiture shall be extended to March 20, 2025.

11 Dated: 2/14/2025

MICHELE BECKWITH  
Acting United States Attorney

12 By: /s/ Kevin C. Khasigian  
13 KEVIN C. KHASIGIAN  
14 Assistant U.S. Attorney

15 Dated: 2/14/2025

/s/ Steven Zangrilli  
STEVEN ZANGRILLI  
Potential Claimant, appearing *in propria persona*  
(Signature authorized by phone)

19 **IT IS SO ORDERED.**

21 Dated: February 14, 2025

/s/ Daniel J. Calabretta  
THE HONORABLE DANIEL J. CALABRETTA  
UNITED STATES DISTRICT JUDGE